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Attorney for Defendant
SHAHROKH MAJDI

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CASE NO: CR-S-04-0130 GEB
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER TO CONTINUE SENTENCING
)	DATE:
v.)	
)	CURRENT SENTENCING DATE:
SHAHROKH MAJDI, et al.)	MARCH 31, 2006 9:00 AM
)	
)	PROPOSED NEW SENTENCING DATE:
Defendant.)	JUNE 2, 2006 9:00 AM
)	
)	
)	

Defendant, Shahrokh Majdi, through his counsel of record, Robert M. Bernstein, and the United States of America, through its counsel of record, Assistant United States Attorney, Laurel White, hereby stipulate to and request an order to continue the date of the sentencing from March 31, 2006 at 9:00 a.m. until June 2, 2006, at 9:00 a.m., based on the following facts:

1. This case is currently scheduled for sentencing on March 31, 2006 at 9:00 a.m.

2. The previous AUSA on the case, Daniel Linhardt, has been replaced by a new AUSA, Laurel White. Ms. White needs time to discuss the case with the former prosecutor.

1 3. Mr. Majdi is working to make full and complete restitution
2 prior to the date of sentencing, pursuant to the plea agreement and
3 will need some additional time to accomplish that.

4 4. Both parties agree that the ends of justice are served by
5 granting this brief continuance of the sentencing hearing.

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7 Dated: February 7, 2006

Respectfully submitted,

8
9 /s/ Robert M. Bernstein

10 _____
11 ROBERT M. BERNSTEIN
12 Attorney for Defendant
SHAHROKH MAJDI

13 Dated: February 7, 2006

14 /s/ Laurel White

15 _____
16 LAUREL WHITE
17 ASSISTANT U.S. ATTORNEY
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ORDER

____GOOD CAUSE HAVING BEEN SHOWN: IT IS SO FOUND AND ORDERED:
That the sentencing hearing currently scheduled for March 31, 2006 at
9:00 A.M. before the Honorable Garland E. Burrell be continued until
June 2, 2006 at 9:00 a.m..

Dated: February 21, 2006

/s/ Garland E. Burrell, Jr.
GARLAND E. BURRELL, JR.
United States District Judge